Comments on this draft release must be submitted to kwhitford@do.usbr.gov
by October 30, 2007.

Background and Purpose of the Following Reclamation Manual Directive and Standards

The Environmental Management Systems (EMS) Directive and Standards (D&S) ENV 05-01 was first released in October 2006. It is being revised to address changes called for in Executive Order 13423, "Strengthening Federal Environmental, Energy, and Transportation Management" issued January 24, 2007.

This D&S was revised to incorporate:

- EMS implementation at an organizational level rather than a facility level. ENV 05-01 now defines the Bureau of Reclamation's "appropriate" organizations (i.e., those offices that are required to implement an EMS) as, at a minimum, the Technical Resource Office, area offices, and other appropriate organizations whose management structure is similar to that of an area office (e.g., Central Valley Project Office, Boulder Canyon Operations Office, Grand Coulee Power Office, etc.).
- Standardize the format of the EMS policy statement required for each EMS. Format is included as Appendix A.

This D&S addresses EMS program responsibilities and requirements and provides the framework for implementation and maintenance of EMS at each appropriate organization located on Reclamation lands. This D&S requires that all management use EMS as the primary management approach to address potential environmental impacts associated with the use of hazardous substances, oils, and the generation of solid or hazardous waste associated with an appropriate organization's activities.

An EMS consists of planning, tracking and reporting processes targeted at significant environmental issues and concerns. The objective of an EMS is to increase management control, decrease liability, and foster continuous improvement in addressing environmental impacts. Many of the processes required under an EMS to properly manage environmental impacts are already occurring within Reclamation. An EMS attempts to increase management control over those activities by consolidating information and efforts into one system. Generally, Reclamation will focus the EMS on facility use of hazardous materials. The International Organization for Standardization (ISO 14001) is the preferred method of implementation.

The Reclamation Manual is used to clarify program responsibility and authority and to document Reclamation-wide methods of doing business. All requirements in the Reclamation Manual are mandatory.

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ENV 05-01

Reclamation Manual

Directives and Standards

Subject: Environmental Management Systems (EMS) Implementation

Purpose: To establish the requirements and responsibilities for development,

implementation, and maintenance of EMS at all appropriate organizations

or facilities on Bureau of Reclamation lands. The benefit of this Directive and Standard (D&S) is continual improvement in managing

Reclamation's environmental liability.

Authority: Executive Order (EO) 13423, Strengthening Federal Environmental,

Energy, and Transportation Management; Clean Water Act (CWA), as amended; Clean Air Act, as amended; Resource Conservation and Recovery Act, as amended; Toxic Substances Control Act, as amended; Comprehensive Environmental Response, Compensation and Liability

Act, as amended; Oil Pollution Act, as amended; Protection of the Environment Title 40 Code of Regulations (CFR); Department Manual

(DM) Part 515 Chapter 4.

Approving Official: Director, Office of Program and Policy Services

Contact: Office of Program and Policy Services, Water and Environmental Resources

Office, 84-55000

1. **Scope.** This D&S provides the framework for implementation and maintenance of EMS at all appropriate organizations located on Bureau of Reclamation lands. It addresses EMS program responsibilities and requirements for implementation, monitoring, evaluation, and review of EMS at appropriate organizations. It also requires that EMS be used as the primary management approach to address potential environmental impacts associated with the use of hazardous substances, oils, and generation of solid or hazardous waste from Reclamation water delivery and power generation activities. All Reclamation facilities and operations whose activities exhibit significant environmental impacts, based on the identification of their environmental aspects, must be incorporated into an EMS. The International Organization for Standardization's ISO 14001 is the preferred model for implementation. (Reclamation Manual [RM] Policy, *EMS*, ENV P05)

2. Introduction. Reclamation is committed to conducting water delivery and power generation in an environmentally sound manner, and in compliance with all applicable Federal, state, and local environmental statutes, regulations, and standards. Reclamation is also committed to continual improvement of environmental performance on Reclamation lands through the systematic management of environmental impacts at appropriate organizations and facilities.

(xxx) mm/dd/yyyy Page A1

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3. Terms and Definitions.

- A. **Appropriate Facility.** A facility on Reclamation lands, that has the potential to exhibit significant environmental impacts based on the identification and evaluation of its environmental aspects.
- B. **Appropriate Organization.** The management or organizational level required to develop, implement and maintain an EMS to address significant environmental impacts at its facilities or operations. At a minimum, the Technical Resource Office, area offices, and other appropriate organizations whose management structure is similar to that of an area office (e.g. Central Valley Project Office, Boulder Canyon Operations Office, Grand Coulee Power Office, etc...) are appropriate organizations
- C. **EMS.** Management practices that develop, implement, and support Reclamation's environmental policy, and manage the environmental impacts of Reclamation activities. An EMS is affected by an appropriate organization's structure, planning, responsibilities, practices, procedures, processes, and resources.
- D. **Environmental Aspect.** That part of a Reclamation activity that, at a minimum, involves the use of hazardous substances, oils, and generation of solid or hazardous waste in support of water delivery or power generation, and that may result in an environmental impact (e.g., the accumulation of used solvent resulting from a vehicle maintenance activity).
- E. **Environmental Impact.** Any qualitative or quantitative change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization or facility's operation, maintenance, or management. At a minimum, this includes the use or generation of hazardous substances, oils, and the generation of solid or hazardous waste.
- F. **Hazardous Substance.** Any substance pursuant to the definitions established through CWA Sections 311 and 307(a); Comprehensive Environmental Response, Compensation, and Liability Act Section 102(a), and that appear at 40 CFR 302.4. (See 40 CFR 373.4)
- G. Oils. Oil of any kind, or in any form, including but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil. (See CWA, 33 U.S.C. 1321 and 40 CFR 109.2, 112.2, 113.3)
- 4. **Regional Director's Responsibilities.** The regional director is responsible for ensuring implementation of EMS at all appropriate organizations within their region in accordance

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with ENV P05, and as provided in Paragraph 5 of this D&S. Responsibility for implementation of EMS may be delegated by the regional director to the appropriate organization level. EMS will be established and implemented, at each appropriate organization to address significant environmental aspects. An appropriate facility's aspects must be included and evaluated as part of the appropriate organization's EMS. All EMS in Reclamation shall be implemented at the appropriate organization level, and include all appropriate organization and facilities under that organization's jurisdiction. The regional director has the specific responsibility to:

- A. Create an implementation plan and schedule to ensure that all appropriate organizations have a fully operational EMS by the December 31, 2008 deadline established in EO 13423 or by a date negotiated with the Office of the Federal Environmental Executive.
- B. Ensure funding is available to implement this program at all appropriate organizations and facilities.
- C. Identify a regional point of contact to work with appropriate organizations on EMS implementation and coordination.
- D. Ensure, where feasible, that anyone who engages in activities identified as having the potential to cause significant environmental impact is competent in managing the activity on the basis of appropriate education, training, and/or experience.
- E. Review each appropriate organization's EMS at planned intervals to ensure continuing suitability, adequacy, and effectiveness. Managerial EMS reviews will be conducted in accordance with Paragraph 5.E of this D&S.
- F. Address actual and potential nonconformities or noncompliance, and take appropriate preventative or corrective action to ensure, at a minimum, processes are in place to comply with applicable environmental requirements.
- 5. **EMS Elements.** The responsible manager (regional director or delegated manager) must endorse the Reclamation environmental policy (ENV P05) using the memorandum in Appendix A. The responsible manager may add additional requirements to the memorandum as necessary. The language included in the appendix is the minimum requirement.

The minimum elements required for EMS are:

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- A. **Planning.** Planning should address the identification and documentation of the environmental aspects, impacts, legal, or other requirements related to the management, operation, or maintenance use of hazardous substances, oil, and generation of solid or hazardous waste on Reclamation lands. The planning element of EMS also requires the establishment and documentation of objectives and targets.
- B. **Objectives and Targets.** Environmental objectives and targets will be established and documented for significant environmental aspects. Any actions needed to meet these objectives and targets will be implemented to the maximum extent allowed by available resources. Environmental impacts will be evaluated against objectives and targets for environmentally significant activities, including the use of hazardous substances, oils, and generation of solid or hazardous waste.
- C. **Implementation and Operation.** This element includes the documentation and communication of roles and responsibilities, provision of appropriate resources, training, internal, and external communication, management system documentation, documentation of management procedures and emergency response procedures.
- D. **Oversight and Corrective Action.** This element includes the regular monitoring and measurement of the procedures implemented in accordance with ENV P05, and as further explained in ENV 05-02.
- 6. **Management Review.** The regional director will ensure management reviews, conducted at planned intervals, of each appropriate organization EMS. The regional director shall document managerial EMS reviews to ensure continued suitability, adequacy, and effectiveness. The management reviews shall focus on conformance with the EMS elements, identified above, and assess opportunities for improvement to include the need for changes to the EMS, and environmental objectives and targets. Management reviews shall, as a minimum, include:
 - A. The results of regional EMS conformance reviews, and compliance with legal requirements;
 - B. Any communication from external interested parties, including complaints;
 - C. The extent to which EMS objectives and targets have been met;
 - D. The status of the EMS, and compliance with any corrective and preventive requirements; and
 - E. The status of any follow-up actions from previous conformance reviews.

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ENV 05-01 Appendix A

Reclamation Manual

Directives and Standards

84-55000 ENV-1.10

MEMORANDUM

To: All Employees

From: [Appropriate Organization, Environmental Management Systems (EMS) Responsible

Manager]

Subject: Endorsement of Bureau of Reclamation Environmental Policy.

In accordance with Executive Order, the Department of the Interior, and Reclamation requirements, [Appropriate Organization Name] endorses the Reclamation environmental policy statement found in ENV P05, and commits to continual improvement in the reduction of environmental impacts from our activities and operations.

In support of the above requirements [Appropriate Organization Name]:

- Will comply with applicable environmental laws, regulations, and all Reclamation requirements for EMS implementation,
- Commits to the promotion of sound environmental practices such as pollution prevention and waste reduction, environmental auditing, and the use of environmentally preferable products, and
- Will establish, manage, and maintain programs and procedures to audit and monitor activities on Reclamation lands with the potential for environmental impacts.

cc: 84-55000 (Whitford)